

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

LORDSTOWN MOTORS CORP., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831-MFW

(Jointly Administered)

Related Docket No. 234

**CERTIFICATION OF COUNSEL REGARDING ORDER WITH RESPECT
TO APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE
EMPLOYMENT AND RETENTION OF TROUTMAN PEPPER HAMILTON
SANDERS LLP AS COUNSEL TO THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS EFFECTIVE AS OF JULY 17, 2023**

The undersigned proposed counsel to the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors in possession (the “Debtors”) hereby certifies as follows:

1. On August 7, 2023, the Committee filed the *Application for Entry of an Order Authorizing the Employment and Retention of Troutman Pepper Hamilton Sanders LLP as Counsel to the Official Committee of Unsecured Creditors Effective as of July 17, 2023* [Docket No. 234] (the “Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. The notice filed with the Application established a deadline of August 21, 2023 at 4:00 p.m. (ET) by which responses to the Application must be filed (the “Response Deadline”).

3. A hearing on the Application is scheduled for August 30, 2023 at 2:00 p.m. (ET).

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

4. Prior to the Response Deadline, the Committee received informal comments from the Debtors regarding the Application.

5. Other than the comments received from the Debtors, the undersigned certifies that she did not receive any formal or informal response to the Application. The undersigned further certifies that she has reviewed the docket in these cases and that no response to the Application appears thereon.

6. Pursuant to the Debtors' comments, the Committee has revised the proposed form of order approving the Application. A form of this revised order (the "Revised Order") is attached hereto as **Exhibit A**. The Revised Order was circulated to the UST and the Debtors, which have advised the undersigned that they do not oppose entry of the Revised Order.

7. Attached hereto as **Exhibit B** is a blackline reflecting the changes between the form of order submitted with the Application and the Revised Order.

WHEREFORE, the Committee respectfully requests that the Court enter the Revised Order at the Court's earliest convenience.

Dated: August 22, 2023
Wilmington, Delaware

Respectfully submitted,

TROUTMAN PEPPER HAMILTON
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/s/ Marcy J. McLaughlin Smith

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*Proposed Counsel to the Official Committee
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